

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

Exhibit B

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF SOUTH CAROLINA
3 COLUMBIA DIVISION
4 CASE NO. 3:21-CV-03302-MBS-TJH-RMG

5 THE SOUTH CAROLINA STATE CONFERENCE OF
6 THE NAACP, AND TAIWAN SCOTT, ON BEHALF
7 OF HIMSELF AND ALL OTHER SIMILARLY
8 SITUATED PERSONS,

9 Plaintiffs,

10 vs.

11 THOMAS C. ALEXANDER, HENRY D. MCMASTER,
12 IN HIS OFFICIAL CAPACITY AS GOVERNOR OF
13 SOUTH CAROLINA; HARVEY PEELER, IN HIS
14 OFFICIAL CAPACITY AS PRESIDENT OF THE
15 SENATE; LUKE A. RANKIN, IN HIS OFFICIAL
16 CAPACITY AS CHAIRMAN OF THE SENATE
17 JUDICIARY COMMITTEE; JAMES H. LUCAS, IN
18 HIS OFFICIAL CAPACITY AS SPEAKER OF THE
19 HOUSE OF REPRESENTATIVES; CHRIS MURPHY,
20 IN HIS OFFICIAL CAPACITY AS CHAIRMAN OF
21 THE HOUSE OF REPRESENTATIVES JUDICIARY
22 COMMITTEE; WALLACE H. JORDAN, IN HIS
23 OFFICIAL CAPACITY AS CHAIRMAN OF THE
24 HOUSE OF REPRESENTATIVES ELECTIONS LAW
25 SUBCOMMITTEE; HOWARD KNABB, IN HIS
 OFFICIAL CAPACITY AS INTERIM EXECUTIVE
 DIRECTOR OF THE SOUTH CAROLINA STATE
 ELECTION COMMISSION; JOHN WELLS, JOANNE
 DAY, CLIFFORD J. ELDER, LINDA MCCALL,
 AND SCOTT MOSELEY, IN THEIR OFFICIAL
 CAPACITIES AS MEMBERS OF THE SOUTH
 CAROLINA STATE ELECTION COMMISSION,

 Defendants.

20 DEPOSITION OF: ANDREW THEODORE FIFFICK
21 (Appearing via VTC)

22 DATE: July 21, 2022

23 TIME: 10:10 a.m.

1 Q. Palmetto.

2 A. It's on tab 64.

3 Q. Tab 64.

4 A. Bates No. 26370.

5 MS. ADEN: Thanks so much.

6 BY MR. TYSON:

7 Q. And it's a map, correct?

8 A. Yes.

9 Q. And it says Palmetto Plan, right?

10 A. Right.

11 Q. And Ms. Aden asked you a lot of
12 questions about this. And then one of the
13 questions that she asked you was, you know, how
14 could you tell by looking at it that it didn't pass
15 muster? So if you just take a look at that plan,
16 can you just describe for the court reporter and
17 for Ms. Aden some of the problems with that plan
18 that you just see?

19 A. I think the thing that struck -- that
20 jumped out at me initially was the way that the 6th
21 was drawn. It just didn't seem compact.

22 Q. What color is the 6?

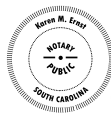
23 A. It's the light blue. And it wasn't a
24 least change plan that I can recall, but I think
25 that's what jumped at us the most was the 6th

CERTIFICATE OF REPORTER

I, Karen M. Beckman, Court Reporter and
Notary Public for the State of South Carolina at
Large, do hereby certify that the foregoing
transcript is a true, accurate, and complete record
to the best of my ability.

I further certify that I am neither
related to nor counsel for any party to the cause
pending or interested in the events thereof.

Witness my hand, I have hereunto
affixed my official seal this 26th day of July,
2022, at Myrtle Beach, Horry County,
South Carolina.



Karen Ernst

Karen M. Beckman
Court Reporter
My Commission expires
September 2, 2025

1 South Carolina State Conference Of Naacp v. Alexander, Thomas C. Et Al
2 Andrew Theodore Fiffick (#5327918)

3 E R R A T A S H E E T

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21 REASON _____

22 _____

23 _____

24 Andrew Theodore Fiffick Date

25 _____

1 South Carolina State Conference Of Naacp v. Alexander, Thomas C. Et Al
2 Andrew Theodore Fiffick (#5327918)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Andrew Theodore Fiffick, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10

11

12 Andrew Theodore Fiffick

Date

13 *If notary is required

14

SUBSCRIBED AND SWORN TO BEFORE ME THIS

15

_____ DAY OF _____, 20____.

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NOTARY PUBLIC

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